1 JENNY L. FOLEY, Ph.D., ESQ. Nevada Bar No. 9017 2 E-mail: jfoley@hkm.com HKM EMPLOYMENT ATTORNEYS LLP 3 101 Convention Center Drive, Suite 600 Las Vegas, Nevada 89109 4 Tel: (702) 805-8340 5 Fax: (702) 805-8340 Attorneys for Plaintiff 6 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 JEFF DEWOLFE, an Individual, Case No. 2:21-cv-01995-GMN-VCF 10 Plaintiff, 11 STIPULATION TO EXTEND TIME TO v. RESPOND TO DEFENDANT'S MOTION 12 FOR CASE TERMINATING SANCTIONS IDEACOM, a Foreign Corporation, DOES I-X; OR IN THE ALTERNATIVE, MOTION TO 13 ROE CORPORATIONS I-X, COMPEL DISCOVERY RESPONSES AND 14 PLAINTIFF'S APPEARANCE AT Defendants. **DEPOSITION (SECOND REQUEST)** 15 16 Plaintiff, Jeff Dewolfe ("Plaintiff") and Defendant IDeACOM, by and through their 17 counsel of record, hereby stipulate to extend the deadline to file responses to the Defendant's 18 Motion For Case Terminating Sanctions Or In The Alternative, Motion To Compel Discovery 19 Responses And Plaintiff's Appearance At Deposition (ECF No. 27). Plaintiff's Response to the 20 Motion was due on January 27, 2023, per a previous stipulation and order (ECF No. 28 and No. 21 29). Plaintiff requested an additional ten-day extension to respond to the Motion due to on-going 22 discovery. As such, the parties stipulate for Plaintiff's Response to be extended until and due on 23 February 6, 2023. The parties also agree and stipulate to an extension for Defendant's Reply. 24 Pursuant to the parties' agreement, Defendant's Reply will be due on February 21, 2023. 25 /// 26 /// 27 /// 28 ///

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| 1 | Accordingly, this extension is made in good faith and not for the purpose of undue delay. | |
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| 2 | DATED this 27th day of January 2023. | DATED this 27th day of January 2023. |
| 3 | HKM EMPLOYMENT ATTORNEYS LLP | WILSON, ELSER, MOSKOWITZ, |
| 4 | Jenny L. Foley | EDELMAN & DICKER LLP |
| 5 | Jenny L. Foley, Ph.D., Esq. Nevada Bar No. 009017 | <u>Taylor A. Buono</u> Sheri M. Thome, Esq. |
| 6 7 | 101 Convention Center Drive, Suite 600 Las Vegas, Nevada 89109 | Nevada Bar No. 008657 Taylor A. Buono, Esq. Nevada Bar No. 015513 |
| | Telephone: (702) 805-8340 Facsimile: (702) 805-8340 | Nevada Bar No. 015513 6689 Las Vegas Blvd. South, Suite 200 |
| 8 | jfoley@hkm.com Attorneys for Plaintiff | Las Vegas, Nevada 89119 Telephone: (702) 727-1400 |
| 10 | Jeff DeWolfe | Telephone: (702) 727-1400 Facsimile: (702) 727-1401 Sheri.Thome@wilsonelser.com Taylor.Buono@wilsonelser.com |
| 11 | | Attorneys for Defendant IDeACOM |
| 12 | | |
| 13 | <u>OR</u> | <u>DER</u> |
| 14 | IT IS SO ORDERED. | |
| 15 | | Contractor |
| 16 | | UNITED STATES MAGISTRATE JUDGE |
| 17 | | January 30, 2023 |
| 18 | | DATED: |
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